



**BNP PARIBAS**  
CORPORATE & INVESTMENT BANKING

November 21, 2014

*Via Electronic Filing*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

Re: *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks; Amendments to Rules for the Ancillary Terrestrial Component of Mobile Satellite Service Systems* – IB Docket No. 13-213, RM-11685;

Dear Madam:

On behalf of Globalstar's Lenders (the "Lenders") under the \$586.3 million Term Loan (the "Facility"), we write to affirm our position in the above referenced proceeding. Globalstar's Lenders extended the Facility to Globalstar in 2009 in order to finance the construction and launch of its second generation constellation of Low Earth Orbit (LEO) Satellites. In deciding to underwrite Globalstar, the Lenders relied upon the prior decisions of the Federal Communications Commission that allocated certain frequencies for Globalstar's exclusive use.

We continue to have concerns about any effort to reallocate any portion of Globalstar's spectrum with or to others, because such changes could have a material negative impact on Globalstar's operational and financial health. The Lenders are concerned that any reallocation of Globalstar's spectrum could jeopardize positive consequences of the complete deployment of Globalstar's constellation, which has already led to a significant increase in demand for Globalstar's mobile satellite service.

Further, we continue to support Globalstar's ability to utilize its allocated spectrum for terrestrial mobile broadband services such as TLPS and are confident that the expeditious adoption by the Commission of its proposed rules in IB Docket No. 12-213 will aid in Globalstar's recovering financial strength and its ability to continue offering a host of innovative satellite services.

Pursuant to section 1.1206(b)(2) of the Commission's rules, this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceeding.

We thank you in advance for taking into account our opinion herewith expressed.

Sincerely,

Jean-Philippe Poirier  
BNP Paribas  
Acting as Agent to the Lenders



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cc: (via email)

Renee Gregory, Office of Chairman Tom Wheeler

Louis Peraertz, Office of Commissioner Mignon Clyburn

David Goldman, Office of Commissioner Jessica Rosenworcel

Brendan Carr, Office of Commissioner Ajit Pai

Erin McGrath, Office of Commissioner Michael O'Rielly

Mindel De La Torre, Chief, International Bureau

Roger Sherman, Chief, Wireless Telecommunications Bureau

Julius Knapp, Chief, Office of Engineering and Technology